

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

2018 AUG 29 PM 4:41
U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON L. EISENBERG,
JACK W. MORGAN,
JACOB A. LESIAK,
BRIAN M. TEACHOUT,
MARGARET L. GARCIA,
GARY L. BALDWIN,
RICHARD E. WARREN,
TREVOR C. MARLYNE,
ROBERT E. ROSS,
CORRIE L. LESIAK,
CYNTHIA A. HOUNSHELL,

Defendants.

INDICTMENT

5:18 CR 513
CASE NO.

Title 18, Sections 922(g)(1),
924(d)(1), 982(a)(1),
1956(a)(1)(A)(i), (a)(1)(B)(i),
(a)(1)(B)(ii), (h), and 2, United
States Code; Title 21, Sections,
841(a)(1), (b)(1)(D), 846, and
853, United States Code; Title
28, Section 2461(c), United
States Code

JUDGE BOYKO

COUNT 1

(Money Laundering Conspiracy, Title 18, U.S.C. §1956(h))

The Grand Jury charges:

1. From in or around May 2014, the exact date unknown to the Grand Jury, and continuing to on or about July 29, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants AARON L. EISENBERG, JACK W. MORGAN, JACOB A. LESIAK, BRIAN M. TEACHOUT, MARGARET L. GARCIA, GARY L. BALDWIN, RICHARD E. WARREN, TREVOR C. MARLYNE, ROBERT E. ROSS, and others, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree together and with diverse others both known and unknown, to knowingly and intentionally conduct and attempt to conduct a series of financial transactions affecting interstate commerce,

which transactions involved the proceeds from a specified unlawful activity, that is, conspiracy to distribute and to possess with the intent to distribute marijuana, a violation of Title 21, United States Code, Section 846, possession of marijuana with the intent to distribute and distribution thereof, in violation of Title 21, United States Code, Section 841, and Title 18, United States Code, Section 2, knowing that the transactions involved the proceeds of some form of specified unlawful activity, and (1) knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and (2) with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

MANNER AND MEANS

2. It was part of the conspiracy that:

a. EISENBERG, MORGAN, and others, both known and unknown to the Grand Jury, sent pallets filled with packages of marijuana from California to warehouses in Euclid, Wickliffe and Willoughby, Ohio, using a commercial carrier called Specialized Transportation Incorporated, hereinafter referred to as STI.

b. EISENBERG, MORGAN and others, both known and unknown to the Grand Jury, attempted to conceal the nature of the contents of the pallets containing marijuana by labeling the contents of the pallets as items such as computer parts.

c. JACOB A. LESIAK, GARCIA, BALDWIN, WARREN, and others, both known and unknown to the Grand Jury, received the pallets filled with marijuana from the commercial carrier, STI, at the warehouses in Euclid, Wickliffe and Willoughby, Ohio.

d. JACOB A. LESIAK, GARCIA, BALDWIN, and WARREN often signed false names on the paperwork from STI when receiving the pallets of marijuana and when shipping pallets containing bulk United States currency back to EISENBERG via STI.

e. JACOB A. LESIAK, TEACHOUT, WARREN, MARLYNE, and ROSS received the packages of marijuana from California and then distributed the marijuana in the Northern District of Ohio and elsewhere.

f. JACOB A. LESIAK, TEACHOUT, WARREN, MARLYNE, ROSS and others pooled their proceeds from the distribution of the marijuana and then sent the proceeds in United States currency back to EISENBERG and MORGAN in California on pallets via the commercial shipping company STI.

g. EISENBERG, MORGAN, JACOB A. LESIAK, WARREN, and others, both known and unknown to the Grand Jury, attempted to conceal the nature of the contents of the pallets containing the United States currency by labeling the contents of the pallets as items such as computer parts.

h. EISENBERG, MORGAN, JACOB A. LESIAK, WARREN, and others often attempted to conceal the identity of the sender and receiver of the pallets containing the United States currency by labeling the pallets with the names of companies that did not exist.

i. EISENBERG used some of the United States currency that he received to pay his living expenses, and he invested some of it in businesses to attempt to conceal the actual nature of his business and the source of the United States currency.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance of the conspiracy, and to affect the goals and conceal the existence of the money laundering conspiracy, Defendants performed and caused others to perform acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

a. On or about May 28, 2014, EISENBERG and MORGAN, along with WARREN, caused a bulk amount of United States currency to be shipped from a warehouse at ***** Airport Parkway, #**, Willoughby, Ohio 44094, and be delivered on or about June 6, 2014, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

b. On or about July 9, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about July 16, 2014, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

c. On or about July 15, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about July 22, 2014, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

d. On or about August 22, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about August 29, 2014, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

e. On or about August 29, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at

***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about September 4, 2014, to
***** Stanford Avenue, #***, Santa Clarita, California 91355.

f. On or about September 10, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about September 17, 2014,
to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

g. On or about October 15, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about October 22, 2014, to
***** Stanford Avenue, #***, Santa Clarita, California 91355.

h. On or about November 5, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about November 12, 2014,
to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

i. On or about November 12, 2014, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Tungeston Road, Euclid, Ohio 44117, and be delivered on or about November 19, 2014,
to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

j. On or about January 7, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Anderson Dr., #*, Wickliffe, Ohio 44092, and be delivered on or about January 14, 2015,
to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

k. On or about February 4, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about February 12, 2015, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

l. On or about February 12, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about February 19, 2015, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

m. On or about March 26, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about April 2, 2015, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

n. On or about April 3, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about April 8, 2015, to ***** Leffingwell Road, Santa Fe Springs, California, 90670.

o. On or about April 22, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at ***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about April 30, 2015, to ***** Stanford Avenue, #***, Santa Clarita, California 91355.

p. On or about May 1, 2015, EISENBERG, MORGAN, and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at

***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about May 7, 2015, to
***** Stanford Avenue, #***, Santa Clarita, California 91355.

q. On or about June 4, 2015, EISENBERG, MORGAN and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about June 13, 2015, to
***** Leffingwell Road, Santa Fe Springs, California, 90670.

r. On or about June 17, 2015, EISENBERG, MORGAN and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about June 25, 2015, to
***** Stanford Avenue, #***, Santa Clarita, California 91355.

s. On or about July 9, 2015, EISENBERG, MORGAN and JACOB A. LESIAK caused a bulk amount of United States currency to be shipped from a warehouse at
***** Anderson Dr. #*, Wickliffe, Ohio 44092, and be delivered on or about July 16, 2015, to
***** Stanford Avenue, #***, Santa Clarita, California 91355.

t. On or about July 23, 2015, EISENBERG, MORGAN and JACOB A. LESIAK caused \$200,080.00 in United States currency to be shipped from a warehouse at *****
Anderson Dr. #*, Wickliffe, Ohio 44092, and attempted to have it delivered to ***** Stanford
Avenue, #***, Santa Clarita, California 91355.

u. On or about July 29, 2015, EISENBERG, MORGAN, JACOB A. LESIAK, BALDWIN, and others, both known and unknown to the Grand Jury, attempted to
cause \$89,840.00 in United States currency to be shipped from a warehouse at ***** Anderson
Dr. #*, Wickliffe, Ohio 44092, and attempted to have it delivered to ***** Stanford Avenue,
#***, Santa Clarita, California 91355.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 2

(Possession with the Intent to Distribute Marijuana, 21 U.S.C. §841)

The Grand Jury further charges:

4. On or about July 29, 2015, in the Northern District of Ohio, Eastern Division, Defendants AARON L. EISENBERG, JACK W. MORGAN, JACOB A. LESIAK, MARGARET L. GARCIA, and GARY L. BALDWIN did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 3

(Possession with the Intent to Distribute Marijuana, 21 U.S.C. §841)

The Grand Jury further charges:

5. On or about July 29, 2015, in the Northern District of Ohio, Eastern Division, Defendants, AARON L. EISENBERG, JACK W. MORGAN, and RICHARD E. WARREN did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D), and Title 18, United States Code, Section 2.

COUNT 4

(Felon in Possession of Firearms and Ammunition, 18 U.S.C. §922(g)(1))

The Grand Jury further charges:

6. On or about July 29, 2015, in the Northern District of Ohio, Eastern Division, Defendant BRIAN M. TEACHOUT, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically, Trafficking in Marijuana, in case

number 2005-CR-764, in the Lake County, Ohio, Court of Common Pleas, on or about April 6, 2006, did knowingly possess in and affecting interstate and foreign commerce, firearms, specifically, a Bushmaster AR-15, model XM15-E2S, bearing serial number L330253; a Smith and Wesson rifle, model M&P 15-22, bearing serial number DZN3761; an AK-47 rifle, bearing serial number 15836203; a Glock model 17 pistol, bearing serial number DSL988US; a SCCY 9mm pistol, bearing serial number 139883; a Walther P22 (Smith and Wesson) .22 caliber pistol, bearing serial number L144409; a Kimber .45 caliber pistol, bearing serial number K403310; a Magnum Research Desert Eagle, .50 caliber pistol, bearing serial number DK0016570, and ammunition, said firearms and ammunition having been previously shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

(Possession with the Intent to Distribute Marijuana, 21 U.S.C. §841)

The Grand Jury further charges:

7. On or about July 29, 2015, in the Northern District of Ohio, Eastern Division, Defendant BRIAN M. TEACHOUT did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

COUNT 6

(Money Laundering Conspiracy, 18 U.S.C. §1956(h))

The Grand Jury further charges:

8. From on or about June 30, 2014, through July 29, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants, JACOB A. LESIAK and CORRIE L.

LESIK, and others, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with diverse others, both known and unknown, to knowingly and intentionally conduct and attempt to conduct a series of financial transactions affecting interstate commerce, which transactions involved the proceeds from a specified unlawful activity, that is, conspiracy to distribute and to possess with the intent to distribute marijuana, in violation of Title 21, United States Code, Section 846, possession of marijuana with the intent to distribute and distribution thereof, in violation of Title 21, United States Code, Section 841, and Title 18, United States Code, Section 2, and (1) knowing that the transactions were designed in whole or in part to conceal the nature, location, source, ownership and control of the proceeds of said unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), and (2) knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

MANNER AND MEANS

9. It was part of the conspiracy that:

a. JACOB A. LESIAK and CORRIE L. LESIAK purchased or caused to be purchased money orders with United States currency, proceeds of marijuana trafficking, at various large retail store locations in the Northern District of Ohio.

b. JACOB A. LESIAK and CORRIE L. LESIAK purchased the money orders in amounts under \$3,000 to avoid having to show identification to the financial institutions.

c. JACOB A. LESIAK and CORRIE L. LESIAK structured the purchases of the money orders to avoid showing identification by going to various locations when purchasing \$3,000 or more in money orders in one day.

d. JACOB A. LESIAK and CORRIE L. LESIAK then used the money orders to pay their bills and other expenses.

e. JACOB A. LESIAK and CORRIE L. LESIAK made cash deposits of marijuana trafficking proceeds into bank accounts in CORRIE L. LESIAK's name and in the name of Lesiak Holdings in an effort to conceal the source of the cash.

ACTS IN FURTHERANCE OF THE CONSPIRACY

10. In furtherance of the conspiracy, and to affect the goals to conceal the existence of the money laundering conspiracy, Defendants, JACOB A. LESIAK and CORRIE L. LESIAK performed and caused others to perform acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:

a. On or about June 30, 2014, Defendants purchased with cash five MoneyGram money orders totaling \$3,039.49 at the following two locations in the Northern District of Ohio:

- i. Walmart #4342 totaling \$1,539.49
- ii. Walmart #5083 totaling \$1,500

b. On or about July 3, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$7,852.30 at the following five locations in the Northern District of Ohio:

- i. Giant Eagle #6377 totaling \$1,452.30
- ii. Giant Eagle #1217 totaling \$1,500

- iii. Marcs #70 totaling \$1,600
- iv. Marcs #61 totaling \$1,550
- v. Walmart #1857 totaling \$1,750

c. On or about July 30, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$4,037.11 at the following two locations in the Northern District of Ohio:

- i. Giant Eagle #6381 totaling \$2,500
- ii. Walmart #1863 totaling \$1,537.11

d. On or about September 2, 2014, Defendants purchased with cash MoneyGram money orders totaling \$4,500 at the following three locations in the Northern District of Ohio:

- i. Marcs #51 totaling \$1,800
- ii. Marcs #32 totaling \$1,000
- iii. Walmart #3293 totaling \$1,700

e. On or about September 3, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$4,500 at the following three locations in the Northern District of Ohio:

- i. Giant Eagle #6381 totaling \$2,000
- ii. Walmart #3293 totaling \$1,000
- iii. Walmart #1863 totaling \$1,500

f. On or about September 5, 2014, Defendants purchased with cash Western Union money orders totaling \$3,106.98 at the following two locations in the Northern District of Ohio:

i. Giant Eagle #4098 totaling \$1,864.99

ii. Giant Eagle #6381 totaling \$1,241.99

g. On or about October 10, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$12,189.18 at the following six locations in the Northern District of Ohio:

i. Giant Eagle #4098 totaling \$2,000

ii. Giant Eagle #6381 totaling \$2,000

iii. Giant Eagle #1225 totaling \$2,366

iv. Marcs #51 totaling \$1,822

v. Walmart #3293 totaling \$2,000

vi. Walmart #1863 totaling \$2,000

h. On or about October 13, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$3,000 at the following two locations in the Northern District of Ohio:

i. Giant Eagle #196 totaling \$2,000

ii. Walmart #1863 totaling \$1,000

i. On or about November 10, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$10,230 at the following six locations in the Northern District of Ohio:

i. Giant Eagle #6414 totaling \$2,000

ii. Giant Eagle #209 totaling \$1,730

iii. Giant Eagle #203 totaling \$2,000

iv. Walmart #5083 totaling \$1,500

v. Walmart #1863 totaling \$1,500

i. Walmart #4342 totaling \$1,500

j. On or about December 18, 2014, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$5,125 at the following four locations in the Northern District of Ohio:

i. Giant Eagle #4133 totaling \$1,825

ii. Marcs #32 totaling \$1,250

iii. Walmart #1863 totaling \$500

iv. Walmart 5387 totaling \$1,550

k. On or about December 22, 2014, Defendants purchased with cash MoneyGram money orders totaling \$3,450 at the following two different locations in the Northern District of Ohio:

i. Marcs #51 totaling \$1,800

ii. Walmart #3293 totaling \$1,650

l. On or about January 27, 2015, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$4,883.78 at the following four locations in the Northern District of Ohio:

i. Giant Eagle #4098 totaling \$2,000

ii. Marcs #51 totaling \$39.64

iii. Walmart #1863 totaling \$810

iv. Walmart #3297 totaling \$2,034.13

m. On or about January 28, 2015, Defendants purchased with cash Western Union money orders totaling \$4,950 at the following two locations in the Northern District of Ohio:

- i. Giant Eagle #6381 totaling \$2,450
- ii. Giant Eagle #196 totaling \$2,500

n. On or about January 29, 2015, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$3,850 at the following two locations in the Northern District of Ohio:

- i. Giant Eagle #1217 totaling \$2,400
- ii. Marcs #61 totaling \$1,450

o. On or about February 3, 2015, Defendants purchased with cash Western Union and MoneyGram money orders totaling \$3,000 at the following two locations in the Northern District of Ohio:

- i. Giant Eagle #216 totaling \$1,000
- ii. Marcs #1863 totaling \$2,000

p. On or about March 4, 2015, Defendants purchased with cash Western Union money orders totaling \$3,000 at the following two locations in the Northern District of Ohio:

- i. Giant Eagle #1217 totaling \$1,677.09
- ii. Giant Eagle #6377 totaling \$1,322.91

q. On or about June 26, 2014, Defendants sent twenty-five (25) money orders totaling \$7,282.70 to Ally Financial as payment on Defendant's Ford F-150 Truck.

r. On or about September 15, 2014, Defendants sent ten (10) money orders totaling \$4,000 to Ally Financial as payment on Defendant's 2014 Chevy Corvette.

s. On or about November 18, 2014, Defendants sent eight (8) money orders totaling \$9,000 to Ally Financial as payment toward Defendant's 2014 Chevy Corvette.

t. On or about February 6, 2015, Defendants sent six (6) money orders totaling \$3,322.91 to Chase Home Finance as payment toward Defendant's home mortgage.

u. On or about January 29, 2014, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

v. On or about February 13, 2014, Defendants deposited \$1,100 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

w. On or about February 21, 2014, Defendants deposited \$4,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

x. On or about February 25, 2014, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK's name account ending in 1330.

y. On or about February 28, 2014, Defendants deposited \$1,500 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

z. On or about March 14, 2014, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

aa. On or about March 27, 2014, Defendants deposited \$1,300 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

bb. On or about March 28, 2014, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

cc. On or about April 7, 2014, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

dd. On or about April 8, 2014, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

ee. On or about April 11, 2014, Defendants deposited \$750 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

ff. On or about April 16, 2014, Defendants deposited \$600 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

gg. On or about April 22, 2014, Defendants deposited \$900 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

hh. On or about April 29, 2014, Defendants deposited \$2,750 into a Home Savings Bank account in CORRIE LESIAK's name, account ending in 1330.

ii. On or about May 1, 2014, Defendants deposited \$1,400 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

jj. On or about May 5, 2014, Defendants deposited \$1,110 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

kk. On or about May 8, 2014, Defendants deposited \$500 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

ll. On or about May 13, 2014, Defendants deposited \$500 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

mm. On or about May 16, 2014, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

nn. On or about May 28, 2014, Defendants deposited \$3,600 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

oo. On or about May 30, 2014, Defendants deposited \$500 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

pp. On or about May 31, 2014, Defendants deposited \$3,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

qq. On or about June 3, 2014, Defendants deposited \$800 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

rr. On or about June 5, 2014, Defendants deposited \$1,800 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

ss. On or about June 10, 2014, Defendants deposited \$800 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

tt. On or about June 12, 2014, Defendants deposited \$1,400 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

uu. On or about June 12, 2014, Defendants deposited \$1,400 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

vv. On or about June 17, 2014, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

ww. On or about June 20, 2014, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

xx. On or about June 20, 2014, Defendants deposited \$1,000 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

yy. On or about June 30, 2014, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

zz. On or about June 30, 2014, Defendants deposited \$2,000 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

aaa. On or about July 7, 2014, Defendants deposited \$3,000 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

bbb. On or about August 7, 2014, Defendants deposited \$2,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

ccc. On or about August 13, 2014, Defendants deposited \$2,009 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

ddd. On or about August 16, 2014, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

eee. On or about August 18, 2014, Defendants deposited \$2,000 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

fff. On or about September 23, 2014, Defendants deposited \$2,500 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

ggg. On or about October 7, 2014, Defendants deposited \$5,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

hhh. On or about November 3, 2014, Defendants deposited \$1,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

iii. On or about November 18, 2014, Defendants deposited \$1,500 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

jjj. On or about November 24, 2014, Defendants deposited \$1,000 into a Huntington National Bank account in CORRIE L. LESIAK's name, account ending in 4378.

kkk. On or about November 24, 2014 Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

lll. On or about December 2, 2014, Defendants deposited \$500 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

mmm. On or about December 2, 2014, Defendants deposited \$2,000 into a Huntington National Bank account in CORRIE L. LESIAK'S name, account ending in 4378.

nnn. On or about December 4, 2014, Defendants deposited \$5,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

ooo. On or about December 9, 2014, Defendants deposited \$4,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

ppp. On or about December 12, 2014, Defendants deposited \$1,500 into a Huntington National Bank account in CORRIE L. LESIAK'S name, account ending in 4378.

qqq. On or about December 19, 2014, Defendants deposited \$5,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

rrr. On or about January 12, 2015, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

sss. On or about January 28, 2015, Defendants deposited \$1,730 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

ttt. On or about January 30, 2015, Defendants deposited \$3,500 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

uuu. On or about February 4, 2015, Defendants deposited \$1,500 into a Home Savings Bank account in CORRIE L. LESIAK's name, account ending in 1330.

vvv. On or about February 25, 2015, Defendants deposited \$4,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

www. On or about February 27, 2015, Defendants deposited \$3,500 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

xxx. On or about March 6, 2015, Defendants deposited \$3,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

yyy. On or about March 10, 2015, Defendants deposited \$2,500 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

zzz. On or about March 17, 2015, Defendants deposited \$1,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

aaaa. On or about March 23, 2015, Defendants deposited \$4,900 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

bbbb. On or about March 25, 2015, Defendants deposited \$3,247.35 into a Home Savings Bank account in CORRIE L. LESIAK' name, account ending in 1330.

cccc. On or about March 31, 2015, Defendants deposited \$1,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

dddd. On or about April 1, 2015, Defendants deposited \$500 into a Huntington National Bank account in CORRIE L. LESIAK'S name, account ending in 4378.

eeee. On or about April 28, 2015, Defendants deposited \$500 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

ffff. On or about May 6, 2015, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

gggg. On or about May 6, 2015, Defendants deposited \$1,000 into a Huntington National Bank account in CORRIE L. LESIAK'S name, account ending in 4378.

hhhh. On or about May 26, 2015, Defendants deposited \$2,110 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

iiii. On or about May 26, 2015, Defendants deposited \$2,000 into a Huntington National Bank account in CORRIE L. LESIAK'S name, account ending in 4378.

jjjj. On or about June 2, 2015, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

kkkk. On or about June 24, 2015, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

llll. On or about June 25, 2015, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

mmmm. On or about June 26, 2015, Defendants deposited \$1,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

nnnn. On or about July 2, 2015, Defendants deposited \$500 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

oooo. On or about July 8, 2015, Defendants deposited \$3,400 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

pppp. On or about July 10, 2015, Defendants deposited \$3,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

qqqq. On or about July 16, 2015, Defendants deposited \$5,000 into a US Bank account in Lesiak Holdings' name, account ending in 2653.

rrrr. On or about July 24, 2015, Defendants deposited \$2,000 into a Home Savings Bank account in CORRIE L. LESIAK'S name, account ending in 1330.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 7

(Money Laundering Conspiracy, 18 U.S.C. §1956(h))

The Grand Jury further charges:

11. From in or around September 2013, the exact date unknown to the Grand Jury, and continuing to on or about July 29, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants AARON L. EISENBERG, CYNTHIA A. HOUNSHELL, and others, both known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with diverse others, both known and unknown, to knowingly and intentionally conduct and attempt to conduct a series of financial transactions affecting interstate commerce, which transactions involved the proceeds from a specified unlawful activity, that is, conspiracy to distribute and to possess with the intent to distribute marijuana, in violation of Title 21, United States Code, Section 846, possession of marijuana with the intent to distribute and distribution thereof, in violation of Title 21, United States Code, Section 841, and Title 18, United States Code, Section 2, knowing that the transactions were designed in whole or in part to conceal the nature, location, source, ownership and control of the proceeds of said unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

MANNER AND MEANS

12. It was part of the conspiracy that:

- a. In September 2013, EISENBERG rented commercial space at a building in Cleveland, Ohio under the name of Iceberg Promotions, LLC. The commercial space included a hair salon, barber shop and tattoo parlor collectively referred to as The Reserve.
- b. EISENBERG hired HOUNSHELL to manage the commercial space renovations and the businesses, including the hair salon, barber shop and tattoo parlor.
- c. EISENBERG and HOUNSHELL knowingly used proceeds from the distribution of marijuana to establish, renovate and operate the businesses at The Reserve.
- d. Between November 2013 and May 2014, EISENBERG set up a series of bank accounts at Fifth Third Bank for the businesses at The Reserve for which he and HOUNSHELL both had signature authority.
- e. In December 2013, HOUNSHELL opened a new bank account for Endless Interiors Design and Consulting LLC at Fifth Third Bank.
- f. EISENBERG and HOUNSHELL deposited or caused to be deposited cash into bank accounts in the name of Millberg LLC and Endless Interiors Design and Consulting LLC in an effort to conceal the source of the cash.
- g. EISENBERG and HOUNSHELL used the funds in the Fifth Third Bank accounts of Millberg LLC and Endless Interiors Design and Consulting LLC to pay expenses associated with the establishment, renovation, and operation of the businesses at The Reserve.

ACTS IN FURTHERANCE OF THE CONSPIRACY

13. In furtherance of the conspiracy, and to affect the goals to conceal the existence of the money laundering conspiracy, Defendants EISENBERG and HOUNSHELL performed and

caused others to perform acts in the Northern District of Ohio and elsewhere, including, but not limited, to the following:

a. From on or about December 2, 2013, to on or about July 8, 2015,

EISENBERG and HOUNSHELL deposited or caused to be deposited cash, including proceeds of marijuana trafficking, into Fifth Third Bank accounts in the name of Millberg LLC and Endless Interiors Design and Consulting LLC in the following amounts:

Date	Amount of Deposit	Account Name	Account Number (ending)
12/02/2013	\$8,000.00	Millberg LLC	5817
12/04/2013	\$6,000.00	Millberg LLC	5817
12/19/2013	\$4,000.00	Millberg LLC	5817
12/24/2013	\$5,000.00	Millberg LLC	5817
12/27/2013	\$5,000.00	Millberg LLC	5817
12/30/2013	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
01/02/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
01/07/2014	\$2,880.00	Endless Interiors Design & Consulting LLC	5841
01/09/2014	\$1,420.00	Endless Interiors Design & Consulting LLC	5841
01/13/2014	\$2,600.00	Millberg LLC	5817
01/14/2014	\$1,600.00	Endless Interiors Design & Consulting LLC	5841
01/15/2014	\$1,200.00	Endless Interiors Design & Consulting LLC	5841
01/17/2014	\$2,800.00	Millberg LLC	5817
01/17/2014	\$1,600.00	Endless Interiors Design & Consulting LLC	5841
01/21/2014	\$2,960.00	Millberg LLC	5817
01/21/2014	\$550.00	Endless Interiors Design & Consulting LLC	5841
01/24/2014	\$2,000.00	Millberg LLC	5817
01/27/2014	\$2,500.00	Endless Interiors Design & Consulting LLC	5841
01/28/2014	\$2,240.00	Millberg LLC	5817
01/31/2014	\$2,600.00	Endless Interiors Design & Consulting LLC	5841
02/03/2014	\$2,900.00	Millberg LLC	5817
02/04/2014	\$2,000.00	Millberg LLC	5817
02/06/2014	\$2,800.00	Millberg LLC	5817
02/12/2014	\$2,500.00	Millberg LLC	5817
02/20/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
02/24/2014	\$2,000.00	Millberg LLC	5817
02/24/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
02/25/2014	\$1,000.00	Millberg LLC	5817
02/25/2014	\$2,757.00	Endless Interiors Design & Consulting LLC	5841

02/27/2014	\$2,600.00	Endless Interiors Design & Consulting LLC	5841
02/28/2014	\$2,800.00	Millberg LLC	5817
02/28/2014	\$2,960.00	Endless Interiors Design & Consulting LLC	5841
03/03/2014	\$1,120.00	Millberg LLC	5817
03/03/2014	\$2,000.00	Endless Interiors Design & Consulting LLC	5841
03/05/2014	\$2,360.00	Millberg LLC	5817
03/05/2014	\$2,640.00	Endless Interiors Design & Consulting LLC	5841
03/07/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
03/10/2014	\$2,100.00	Millberg LLC	5817
03/11/2014	\$2,300.00	Endless Interiors Design & Consulting LLC	5841
03/14/2014	\$2,000.00	Endless Interiors Design & Consulting LLC	5841
03/17/2014	\$2,000.00	Millberg LLC	5817
03/20/2014	\$2,700.00	Millberg LLC	5817
04/01/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
04/02/2014	\$2,000.00	Millberg LLC	5817
04/02/2014	\$2,000.00	Endless Interiors Design & Consulting LLC	5841
04/03/2014	\$2,000.00	Millberg LLC	5817
04/03/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
04/08/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
04/10/2014	\$2,500.00	Endless Interiors Design & Consulting LLC	5841
04/14/2014	\$2,500.00	Millberg LLC	5817
04/15/2014	\$2,920.00	Endless Interiors Design & Consulting LLC	5841
04/17/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
04/18/2014	\$2,940.00	Endless Interiors Design & Consulting LLC	5841
04/21/2014	\$2,700.00	Millberg LLC	5817
04/22/2014	\$2,920.00	Endless Interiors Design & Consulting LLC	5841
04/23/2014	\$2,700.00	Millberg LLC	5817
04/24/2014	\$2,300.00	Endless Interiors Design & Consulting LLC	5841
04/25/2014	\$2,500.00	Millberg LLC	5817
04/28/2014	\$2,920.00	Endless Interiors Design & Consulting LLC	5841
04/30/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
05/02/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
05/06/2014	\$1,080.00	Endless Interiors Design & Consulting LLC	5841
05/12/2014	\$1,460.00	Millberg LLC	5817
05/22/2014	\$500.00	Millberg LLC	5817
05/22/2014	\$2,500.00	Endless Interiors Design & Consulting LLC	5841
05/23/2014	\$1,655.50	Millberg LLC	5817
05/27/2014	\$2,700.00	Endless Interiors Design & Consulting LLC	5841
05/29/2014	\$2,000.00	Millberg LLC	5817
05/29/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
06/06/2014	\$450.00	Millberg LLC	5817
06/10/2014	\$2,700.00	Millberg LLC	5817
06/11/2014	\$1,000.00	Millberg LLC	5817

06/17/2014	\$2,500.00	Millberg LLC	5817
06/17/2014	\$2,600.00	Endless Interiors Design & Consulting LLC	5841
06/20/2014	\$2,840.00	Endless Interiors Design & Consulting LLC	5841
06/25/2014	\$940.00	Endless Interiors Design & Consulting LLC	5841
06/27/2014	\$1,000.00	Millberg LLC	5817
07/17/2014	\$2,800.00	Millberg LLC	5817
07/17/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
07/21/2014	\$370.00	Millberg LLC	5817
07/23/2014	\$2,500.00	Millberg LLC	5817
07/30/2014	\$1,600.00	Millberg LLC	5817
07/30/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
08/01/2014	\$2,800.00	Millberg LLC	5817
08/01/2014	\$2,200.00	Endless Interiors Design & Consulting LLC	5841
08/06/2014	\$1,500.00	Millberg LLC	5817
08/06/2014	\$1,000.00	Endless Interiors Design & Consulting LLC	5841
08/11/2014	\$1,832.00	Millberg LLC	5817
08/28/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
09/04/2014	\$2,800.00	Millberg LLC	5817
09/25/2014	\$2,000.00	Endless Interiors Design & Consulting LLC	5841
09/26/2014	\$1,000.00	Millberg LLC	5817
09/26/2014	\$1,900.00	Endless Interiors Design & Consulting LLC	5841
10/30/2014	\$2,900.00	Endless Interiors Design & Consulting LLC	5841
10/31/2014	\$2,800.00	Endless Interiors Design & Consulting LLC	5841
11/04/2014	\$1,200.00	Millberg LLC	5817
11/13/2014	\$1,000.00	Endless Interiors Design & Consulting LLC	5841
12/02/2014	\$600.00	Endless Interiors Design & Consulting LLC	5841
12/04/2014	\$500.00	Millberg LLC	5817
12/04/2014	\$500.00	Endless Interiors Design & Consulting LLC	5841
12/18/2014	\$1,100.00	Millberg LLC	5817
12/18/2014	\$1,900.00	Endless Interiors Design & Consulting LLC	5841
01/07/2015	\$2,850.00	Endless Interiors Design & Consulting LLC	5841
01/14/2015	\$2,900.00	Millberg LLC	5817
01/15/2015	\$980.00	Endless Interiors Design & Consulting LLC	5841
03/11/2015	\$2,800.00	Millberg LLC	5817
05/07/2015	\$160.00	Millberg LLC	5817
05/13/2015	\$200.00	Millberg LLC	5817
07/08/2015	\$200.00	Millberg LLC	5817
	<u>\$246,904.50</u>	Total Cash Deposits	

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

14. For the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 924(d)(1) and 982(a)(1), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 7 are incorporated herein by reference. As a result of the foregoing offenses, Defendants AARON L. EISENBERG, JACK W. MORGAN, JACOB A. LESIAK, BRIAN M. TEACHOUT, MAGGIE L. GARCIA, GARY L. BALDWIN, TREVOR C. MARLYNE, ROBERT E. ROSS, CORRIE L. LESIAK and CYNTHIA A. HOUNSHELL shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; any property, real or personal, involved in such offenses and any property traceable to such property; and any and all property (including firearms and ammunition) involved in or used in the commission of such violations; including, but not limited to, the following:

- a. Taurus, model R462, .357 caliber Magnum Revolver, serial #HX957450;
- b. SCCY, 9mm pistol, serial #139883, with two magazines;
- c. Walther P22 (Smith and Wesson), .22 caliber pistol, serial #L144409, with two magazines;
- d. Kimber, .45 caliber pistol, serial #K403310, with two magazines;
- e. Magnum, Research Desert Eagle, .50 caliber pistol, serial #DK0016570, with one magazine;
- f. Glock, 17, 9mm pistol, serial #DSL988US;
- g. Romarm/Cugir, model WASR-10, AK 47 rifle, serial #1-58362-03;
- h. Bushmaster AR-15, model XM15-E2S, serial #L330253;

- i. Smith & Wesson rifle, model M&P 15-22, serial #DZN3761;
- j. miscellaneous ammunition seized during search of residence in Concord, Ohio, on July 29, 2015; and,
- k. miscellaneous ammunition seized during search of residence in Mentor, Ohio, on July 31, 2015.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.